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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION
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6 COMMISSION INQUIRY INTO POSSIBLE
 MODIFICATION OF THE COMMISSION'S
 7 HOLDING COMPANIES AND AFFILIATED
 INTEREST RULES, A.A.C. ARTICLE 8, R14-
 8 2-801 ET SEQ.

DOCKET NO. AU-00000A-15-0246

STAFF'S NOTICE OF FILING

9
 10 Pursuant to Decision No. 75448, Staff hereby provides notice of filing the attached Economic,
 11 Small Business, and Consumer Impact Statement.

12 RESPECTFULLY SUBMITTED this 27th day of April 2016.

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21 Docket Control
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Arizona Corporation Commission

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APR 27 2016

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ECONOMIC, SMALL BUSINESS AND CONSUMER IMPACT STATEMENT

A.R.S. § 41-1055.

B. Economic, Small Business and Consumer Impact Statement

1. Identification of the proposed rulemaking.

The purpose of the proposed rule change would be to amend R14-2-802(A) to exempt telecommunications carriers, whose retail telecommunications services have all been determined to be competitive, from application of the Affiliated Interest Rules, except as may otherwise be determined by a future Commission order. The specific change proposed is supported by the changes to A.R.S. § 40-285 made by the Arizona Legislature in 2013.¹

2. Persons who will be directly affected by, bear the costs of, or directly benefit from the proposed rulemaking.

- a. Telecommunications service providers whose services have been determined to be competitive in Arizona; and the
- b. Arizona Corporation Commission.

3. Cost-benefit analysis.

a. Probable costs and benefits to the implementing agency and other agencies directly affected by the implementation and enforcement of the proposed rulemaking.

There are no probable costs to the Commission. Probable benefits to the Commission of the proposed rulemaking would include cost and time savings associated with no longer having to process applications for waivers of the Affiliated Interest Rules associated with reorganizations, mergers, consolidations or refinancing, along with no longer having to process Class A Investor-Owned Utilities and Affiliates Annual Reports filed by telecommunications companies.

b. Probable costs and benefits to a political subdivision of this state directly affected by the implementation and enforcement of the proposed rulemaking.

Not applicable.

c. Probable costs and benefits to businesses directly affected by the proposed rulemaking, including any anticipated effect on the revenues or payroll expenditures of employers who are subject to the proposed rulemaking.

¹ In 2013, the legislature added Subpart (F) to the statute which reads as follows: "F: This section does not apply to a telecommunications corporation whose retail telecommunications services are all classified as competitive by the commission, except as may otherwise be determined by a commission order after the effective date of this amendment to this section."

Probable benefits to telecommunications companies which would be exempted by the proposed rulemaking would include cost and time savings associated with no longer having to submit applications for waivers of the Affiliated Interest Rules associated with reorganizations, mergers, consolidations or refinancing, along with no longer having to submit Class A Investor-Owned Utilities and Affiliates Annual Reports. Payroll expenditures of exempted companies will probably not be affected. Any revenue increase of exempted companies as a result of no longer having to perform the aforementioned filings is probably de minimis.

4. **Probable impact on private and public employment in businesses, agencies, and political subdivisions of this state directly affected by the proposed rulemaking.**

No impact on employment is expected.

5. **Probable impact of the proposed rulemaking on small businesses.**

a. **Identification of the small businesses subject to the proposed rulemaking.**

To the extent that a small business may be involved in a future merger with an exempted telecommunication company, the small business may benefit as such a transaction would be less burdensome from a regulatory perspective.

b. **Administrative and other costs required for compliance with the proposed rulemaking.**

None.

c. **A description of the methods that the agency may use to reduce the impact on small businesses.**

Not applicable.

d. **Probable cost and benefit to private persons and consumers who are directly affected by the proposed rulemaking.**

There should be no costs or benefits to private persons who are customers of exempted telecommunications companies as a result of this rulemaking.

6. **Probable effect on state revenues.**

None.

7. **Less intrusive or less costly alternative methods of achieving the purpose of the proposed rulemaking.**

The Commission is unaware of any alternative methods of achieving the purpose of the rulemaking that would be less intrusive or less costly.

8. **Description of any data on which the rule is based.**

While some data was considered, the proposed rulemaking is not based on this data.

C. **If for any reason adequate data are not reasonably available to comply with the requirements of subsection B of this section, the agency shall explain the limitations of the data and the methods that were employed in the attempt to obtain the data and shall characterize the probable impacts in qualitative terms.**

While some data was considered, the proposed rulemaking is not based on this data.